



United States District Court
Eastern District of California

FILED

OCT 07 2024

CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
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Randall L. Dougherty, Sr., Individually and on behalf of the Estate
of Randall B. Dougherty, Jr., Deceased; and Jolene Dougherty

Plaintiff(s)

Case Number: 1:24-cv-00818-KES-EPG

V.

Target Corporation, et al.

Defendant(s)

APPLICATION FOR PRO HAC VICE
AND PROPOSED ORDER

Pursuant to Local Rule 180(b)(2) of the United States District Court for the Eastern District of California,

Dixie T. Wells hereby applies for permission to appear and participate as

counsel in the above entitled action on behalf of the following party or parties:

Defendants Target Corporation, Empower Brands, LLC and Tristar Products, Inc.

On August 21, 1999 (date), I was admitted to practice and presently in good standing in the
Supreme Court of North Carolina (court). A certificate of good standing from that court is
submitted in conjunction with this application. I have not been disbarred or formally censured by a court of
record or by a state bar association; and there are not disciplinary proceedings against me.

☐ I have ☒ I have not concurrently or within the year preceding this application made a pro hac vice
application to this court. (If you have made a pro hac vice application to this court within the last year, list
the name and case number of each matter in which an application was made, the date of application and
whether granted or denied.)

Date: September 30, 2024

Signature of Applicant: /s/ Dixie T. Wells

Pro Hac Vice Attorney

Applicant's Name: Dixie T. Wells
Law Firm Name: Ellis & Winters LLP
Address: P.O. Box 2752

City: Greensboro State: N.C. Zip: 27402
Phone Number w/Area Code: (336) 217-4193
City and State of Residence: Greensboro, North Carolina
Primary E-mail Address: Dixie.Wells@elliswinters.com
Secondary E-mail Address: Crystal.Boyd@elliswinters.com

I hereby designate the following member of the Bar of this Court who is registered for ECF with whom the Court and opposing counsel may readily communicate regarding the conduct of the case and upon whom electronic notice shall also be served via the Court's ECF system:


Local Counsel's Name: Eileen Ahern
Law Firm Name: Willenken LLP
Address: 707 Wilshire Blvd., Suite 3850

City: Los Angeles State: CA Zip: 90017
Phone Number w/Area Code: (213) 955-9240 Bar # 216822

ORDER

The Pro Hac Vice Application is APPROVED. The Pro Hac Vice Attorney is DIRECTED to request filing access through PACER.

Dated: 10/7/24



JUDGE, U.S. DISTRICT COURT

OFFICE OF THE CLERK OF THE SUPREME COURT OF THE DISTRICT OF COLUMBIA



I, Dixie T. Wells, Clerk of the Supreme Court of the District of Columbia, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the records of the Court.

Dixie T. Wells

In testimony whereof, I have hereunto set my hand and the Seal of the Supreme Court of the District of Columbia at Washington, D.C., this 10th day of October, 2024.

Witness my hand and the Seal of the Supreme Court of the District of Columbia at Washington, D.C., this 10th day of October, 2024.

By Dixie T. Wells, Clerk of the Supreme Court of the District of Columbia.